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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

CR 11 1102 PHX. SRB - (2)(1)

United States of America,
Plaintiff,
v.
Donald Lapre,
Defendant.

INDICTMENT

VIO: 18 U.S.C. §§ 371 and 2
(Conspiracy)
Count 1

18 U.S.C. §§ 1341, 2326 and 2
(Mail Fraud)
Counts 2-11

18 U.S.C. §§ 1343, 2326 and 2
(Wire Fraud)
Counts 12-21

18 U.S.C. §§ 1956(a)(1)(A)(I) and
2
(Promotional Money Laundering)
Counts 22-31

18 U.S.C. §§ 1957(a) and 2
(Transactional Money
Laundering)
Counts 32-41

18 U.S.C. §§ 982(a) and (b)
(Criminal Forfeiture)

1 THE GRAND JURY CHARGES:

2 **INTRODUCTION**

3 At times material to this Indictment:

4 1. The Greatest Vitamin in the World, LLC, (GVW) was formed by defendant DONALD
5 LAPRE as a limited liability company organized under the laws of the State of Arizona on April
6 2, 2003. The listed address of GVW on the corporation application was the defendant's home
7 address in Maricopa County, Arizona. The defendant was listed as the statutory agent and Lapre
8 Children's Trust was listed as a member of GVW.

9 2. Guaranteed Traffic, LLC, (GT) was formed by defendant DONALD LAPRE as a
10 limited liability company organized under the laws of the State of Arizona on December 6, 2001.
11 The listed address of GT on the corporation application was the defendant's home address in
12 Maricopa County, Arizona. Lapre Children's Trust was listed as a member of the GT LLC.

13 3. Torica, LLC, (TOR) was formed by defendant DONALD LAPRE as a limited liability
14 company organized under the laws of the State of Arizona on August 8, 2001. The listed address
15 of TOR on the corporation application was the defendant's home address in Maricopa County,
16 Arizona. Lapre Children's Trust was listed as a member of the TOR LLC.

17 4. Amazing Products International (API), Phoenix, Arizona, is the name of a company that
18 merged with GVW per a form letter, dated May 29, 2007, signed by GVW and API
19 CEO/President, defendant DONALD LAPRE. Per the Arizona Secretary of State, there is a
20 registered trade name in the business name of Amazing Products International. The name of the
21 owner of API is listed as Erica, Inc., Phoenix, Arizona. This business was commenced on
22 November 8, 2006. Per the Arizona Secretary of State, the president of Erica, Inc., is defendant
23 DONALD LAPRE.

24 5. For the purposes of this Indictment, Greatest Vitamin in the World, LLC; Guaranteed
25 Traffic, LLC; Torica, LLC; Amazing Products International; and Erica, Inc., will hereinafter be
26 collectively referred to as GVW in light of defendant DONALD LAPRE's close association and
27 management of all of these entities and their collective use in furtherance of the subject
28 conspiracy and schemes to defraud.

6. Defendant DONALD LAPRE was the president, owner and manager of the entities collectively referred to as GVW, which presented themselves as enterprises that sold business opportunities to individuals as well as vitamins and other health related materials to the public.

COUNT 1

(Conspiracy)

7. The factual allegations of paragraphs 1 through 6 above are realleged and incorporated by reference.

8. Beginning at a time unknown to the Grand Jury, but at least as early as on or about April, 2003, and continuing through at least on or about October, 2007, in the District of Arizona and elsewhere, defendant DONALD LAPRE, doing business under the entities described above, did knowingly and willfully agree and conspire with others, known and unknown to the Grand Jury, to commit one or more of the following offenses against the United States:

- a. Title 18, United States Code, Sections 1341, 2326, and 2 (Mail Fraud & Telemarketing);
- b. Title 18, United States Code, Sections 1343, 2326, and 2 (Wire Fraud & Telemarketing);
- c. Title 18, United States Code, Sections 1956(a)(1)(A)(I) and 2 (Promotional Money Laundering); and
- d. Title 18, United States Code, Sections 1957(a) and 2 (Transactional Money Laundering).

OBJECTS OF THE CONSPIRACY AND SCHEMES TO DEFRAUD

9. The objects of the conspiracy and schemes to defraud were:

- a. to deceive victims/investors into purchasing “valuable” Internet-based programs that set up victims/investors as distributors, also known as “Independent Advertisers” (IAs), with an individual website that offered “The Greatest Vitamin

1 in the World” to the public, which business opportunities were, in fact, in many
2 cases worthless;

3 b. to reload and re-solicit victims into purchasing additional marketing packages that
4 purportedly stimulated consumer interest in individual Internet-based sales
5 programs;

6 c. to deceive IAs into purchasing allegedly “valuable” directed Internet traffic from
7 potential vitamin purchasers which was, in fact, nearly worthless bulk Internet
8 traffic; and

9 d. to profit financially from GVW’s fraudulent misrepresentations and promises.

10
11 **MANNER AND MEANS OF THE CONSPIRACY AND SCHEMES TO DEFRAUD**

12 10. The manner and means used by the defendant, and others known and unknown to the
13 Grand Jury, through the entities described above, to effect the objects of the conspiracy and the
14 schemes and artifices to defraud, included the following:

15 a. Victims were regularly solicited through television infomercials, telephone calls, written
16 promotional materials and materials offered via a website to become “independent
17 advertisers” (IAs) in order to market vitamins and health-related products primarily through
18 individual Internet-based businesses and to attract others to become IAs in order to do the
19 same things.

20 b. GVW’s written materials and sales presentations materially misrepresented the income
21 potential of IAs through the programs offered, frequently describing the potential with terms
22 such as “amazing,” “unbelievable” and “incredible.” In fact, as the scheme progressed, IAs
23 were never advised that their individual Internet-based business would ultimately be
24 competing against over 200,000 other “businesses” offering the exact same limited number
25 of products in essentially the same manner.

26 c. Once victims/IAs called in to sign up to become IAs, they generally were asked to pay
27 \$35.00 plus \$13.65 for shipping. This payment covered the basic initial setup fee, an
28

1 individual website and a Start-Up Kit. Upon payment, the victims/investors would become
2 an IA for GVW. GVW sales representatives regularly signed up victims as IAs even if they
3 did not own a computer; these victim/IAs were also charged a monthly service fee for the
4 operation of their personal websites.

5 d. In order to attract consumers/investors to this scheme, defendant DONALD LAPRE
6 aired television infomercials throughout the United States, typically on cable and satellite
7 channels. One alluring infomercial was hosted by an attractive female spokesperson who
8 pitched, over and over, what an incredible opportunity the subject program was and how
9 millions of dollars in commissions had already been paid out by the program. Viewers of
10 the infomercial were never told what the name of the company was or any specifics of the
11 "program." In small print near the end of the infomercial, and at the bottom of the screen,
12 was the name Torica, LLC. On the infomercial, multiple additional individuals appeared
13 and gave testimonials about how great the program was and how they earned thousands of
14 dollars as an IA, with only hours of work in some cases. Over the course of the conspiracy
15 and schemes to defraud, of the approximately 226,000 IAs who purchased one or more
16 products sold to them as an opportunity to make money or improve their chances of making
17 money, only approximately 5,000 IAs were ever paid anything by GVW for their product
18 sales or recruitment of additional IAs. The successful IAs who appeared on television were
19 among this very small minority of IAs who were successful selling GVW products.

20 e. While viewing GVW infomercials, interested viewers were instructed to call the
21 infomercial's 800 telephone number. When connected to the 800 number, a caller had the
22 opportunity to listen to a 15 to 25 minute recorded sales pitch from defendant DONALD
23 LAPRE. During the recorded sales pitch, the caller was given the opportunity to be
24 transferred to a live GVW sales representative who then pitched the general program to the
25 caller. During the sales pitch, the caller was advised that for the initial set up fee of \$35.00
26 plus \$13.65 for shipping, they would receive a website and a Start-Up Kit. Upon payment,
27 they would become an IA for GVW.
28

f. The Start-Up Kit was sent to new IAs by private interstate courier (typically Federal Express (FedEx) or the United States Postal Service (USPS)). The kit included an audio CD of defendant DONALD LAPRE pitching GVW's many different advertising programs, plus a booklet titled the "Independent Advertiser Program." IA fees were usually paid by debit or credit card. The "generic" website received by each IA gave them the ability to sell bottles of GVW's vitamins on their own website. The website also included a "back office" accessible to the IAs but not their customers. In order to access their website "back office," IAs were provided a unique "Affiliate ID" number and password. The back office was an area of an IA's website which disclosed the number of consumer purchases of bottles of vitamins and the amount of visitor traffic to each website. All of the original IA websites were constructed by GVW employees and appeared to be identical in nature except for the domain name, which was the unique web name/address chosen by each IA. Near the end of the conspiracy and schemes to defraud, defendant DONALD LAPRE, through his associates at GVW, had created over 226,000 websites which all offered the same limited number of products for sale in essentially the same manner.

g. IAs were further advised by representatives of GVW that they would be eligible for a commission check, in the amount of \$1,000.00, once they generated 20 new consumers who purchased at least one bottle of vitamins from their website or by attracting 20 new investors to the business opportunity program. According to GVW's promotion materials, there were multiple means of making commissions; some of these means were listed as:

1. **"Each time you get 20 new people to try our vitamin, we send you a check for \$1,000!"**
2. **"If someone goes to your website, and decides to get signed up with our Independent Advertiser program, every single time they generate a check for \$1,000, by getting just 20 new people to try our Vitamin, you also get a check for \$500!"**
3. **"After paying out millions, just with The Greatest Vitamin in the World product, we decided to add the 4 Perfect Pills onto your website! Each time you get just 20 new people to try any of these products, you get an additional check for \$1,000!"**

- 1 4. **"Each 100 new people you get to try The Greatest Vitamin in the**
- 2 **World, in any given month, we pay you \$10,000."**
- 3 5. **"Each time you generate 5 \$1,000 checks from our company, we send**
- 4 **you and one other person on a 7 day paid vacation!"**
- 5 6. **"Each time you generate a \$1,000 check, our company takes a brand**
- 6 **new Independent Advertiser that we just created from TV and we tag**
- 7 **them to you! Then, each time they generate \$1,000 by getting 20 new**
- 8 **people to try our amazing Vitamin, you get a check for \$500!"**
- 9 7. **"A \$5,000 BONUS CHECK given to EVERY Independent Advertiser**
- who generates just 100 new vitamin clients this month, you will be paid an**
- additional \$5,000."**
8. **"A \$5,000 BONUS CHECK will also be given to our top two people each**
- month."**

10 h. After defrauding victims in the initial sale of IAs, defendant DONALD LAPRE,
 11 through his team of sales representatives, further solicited and reloaded victims through
 12 supplemental advertising programs.

13 i. The additional advertising programs were fraudulent in that GVW sales representatives
 14 regularly deceived IAs into purchasing additional advertising through the understanding that
 15 it would make their individual websites profitable. In fact, IAs were generally not told prior
 16 to their initial investment that additional Internet advertising expenses would be needed to
 17 purportedly be profitable in the promotion of their website, and that it would actually cost
 18 them thousands of dollars more to be successful. Nor were they generally told that their
 19 individual websites were competing against tens of thousands of similar websites offering
 20 the exact same limited number of products for sale.

21 j. GVW sales representatives regularly attempted to reload, or upsell (sell additional
 22 services), Internet advertising programs to IAs at exorbitant prices. The main program was
 23 the 12,000 "targeted" Internet visitor program, or the Guaranteed Visitors program. This
 24 "targeted" visitor traffic purportedly consisted of consumers who were already interested
 25 in purchasing vitamins or interested in investing in a home-based business opportunity.
 26 These visitors would purportedly generate significant income for the IAs. Reloaders
 27 attempted to obtain amounts up to \$3,495.00 for this Internet advertising. In reality, the
 28

1 Internet visitor traffic provided to IAs was not the “targeted” visitor traffic as claimed, but
2 was inexpensive bulk traffic that could be provided by various means including pop-up,
3 pop-under or banner advertisements on a website.

4 k. During the course of the conspiracy and schemes to defraud, approximately 226,794
5 victim-purchasers of IAs were defrauded of approximately \$51,816,308.67. Throughout this
6 same period, total commissions paid to the victim IAs was approximately \$6,346,271.74.

7 l. During the course of the conspiracy and schemes to defraud, defendant DONALD
8 LAPRE received numerous payments from GVW, including, but not limited to, \$739,000
9 in 2004; \$746,831 in 2005; \$658,000 in 2006; and \$122,952 in 2007.

10
11 **OVERT ACTS**

12 11. In furtherance of the aforesaid conspiracy, and to effect the objects of the conspiracy,
13 the defendant, and others known and unknown to the Grand Jury, through the entities described
14 above, committed or caused to be committed various acts in the District of Arizona and
15 elsewhere.

16 a. The following overt acts, among others, were committed:

17 1. On or about April 2, 2003, The Greatest Vitamin in the World, LLC, was formed by
18 defendant DONALD LAPRE as a limited liability company organized under the laws of the
19 State of Arizona.

20 2. On or about April 2, 2003, Articles of Organization for The Greatest Vitamin in the
21 World, LLC, were filed with the Arizona Corporation Commission.

22 3. On or about June 13, 2003, defendant DONALD LAPRE opened a business economy
23 checking account, account No. XXXXXXXXX1139, on behalf of The Greatest Vitamin in the
24 World, LLC, at Bank of America, N.A., Phoenix, Arizona.

25 4. On or about June 13, 2003, defendant DONALD LAPRE opened a business economy
26 checking account, account No. XXXXXXXXX8016, on behalf of The Greatest Vitamin in the
27 World, LLC, at Bank of America, N.A., Phoenix, Arizona.

1 5. On or about May 7, 2005, D.Y., of Crown Point, Indiana, called a GVW 800 telephone
2 number and spoke to a sales representative. The representative advised that he would get a
3 \$1,000.00 commission for getting 20 people to invest in the business or buy vitamins from his
4 website. In addition, for a discounted price of \$1,200.00, D.Y. was advised that he would
5 receive 3,000 targeted visitors to his website. D.Y. was told that he only had to pay \$400.00 up
6 front and the \$800.00 balance for the visitor traffic would be taken from his first commission
7 check at a later date. D.Y. paid \$39.95 for his GVW's Start-Up Kit by credit card. The kit was
8 to include a CD where one could print out flyers, business cards, etc. D.Y. received the kit
9 approximately 7 to 10 days after his first phone call to GVW.

10 6. On or about May 12, 2005, D.Y., of Crown Point, Indiana, received a telephone call
11 from a GVW sales representative and was offered an upgrade of 12,000 hits of targeted visitor
12 traffic plus a "Platinum Package." This package came with an 800 telephone number and the
13 placement of video clips on his website. D.Y. allowed GVW to charge an additional \$2,000.00
14 on his credit card for the additional package.

15 7. On or about October 30, 2005, IAs B.R., of Severy, Kansas, and C.C., of Burleson,
16 Texas, were simultaneously credited for the same vitamin purchase by K.L. of Lawson, Ohio.

17 8. On or about November 5, 2005, IAs B.R., of Severy, Kansas, and C.C., of Burleson,
18 Texas, were simultaneously credited for the same vitamin purchase by O.C., of Ocala, Florida.

19 9. On or about November 11, 2005, N.S., of Lincoln, Nebraska, called GVW while
20 viewing a GVW infomercial and spoke to a GVW representative. The representative advised
21 her that all she had to do was sell their vitamins to 20 new customers and she would be paid
22 \$50.00 per bottle. She would need to direct these customers to her website. With their Starter
23 Kit, she would receive a disc, where she could print out business cards, flyers, etc. She bought
24 the kit during the course of the conversation by allowing GVW to charge \$140.99 to her credit
25 card. The Starter Kit arrived in a box a few days later.

26 10. On or about November 16, 2005, N.S., of Lincoln, Nebraska, was called by GVW
27 salesperson A.S. A.S. stated that she was calling to activate N.S.'s website. The website setup
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1 fee was \$295.00. N.S. was told her website would not work without paying this fee. There was
2 also a \$9.95 per month web hosting fee, which also was never brought up to her before. GVW
3 Sales Representative A.S. told N.S. that she could also send to her website 12,000 "Guaranteed
4 Web Browser Clients." N.S. allowed GVW to charge an additional \$2,695.00 on her credit card
5 at this time; the charges included her setup fee and 12,000 website visitors.

6 11. On or about November 18, 2005, IAs C.C., of Burleson, Texas, and N.S., of Lincoln,
7 Nebraska, were simultaneously credited for two vitamin purchases by J.B., of Washington.

8 12. On or about November 25, 2005, IAs C.C., of Burleson, Texas, and N.S., of Lincoln,
9 Nebraska, were simultaneously credited for the same vitamin purchase by S.G., of Virginia.

10 13. On or about December 5, 2005, IAs C.C., of Burleson, Texas, and N.S., of Lincoln,
11 Nebraska, were simultaneously credited for the same vitamin purchase by C.L.K., of
12 Washington.

13 14. On or about December 11, 2005, IAs C.C., of Burleson, Texas, and N.S., of Lincoln,
14 Nebraska, were simultaneously credited for the same vitamin purchase by J.M., of Rockwall,
15 Texas.

16 15. On or about March 7, 2006, E.J., of Clarksville, Indiana, watched a half hour GVW
17 infomercial. E.J. saw the infomercial late at night on a satellite channel and defendant DON
18 LAPRE was in it. E.J. called GVW's 800 telephone number that night and ordered a Start-Up
19 kit for \$35.00 and a one month supply of vitamins for \$48.60. E.J. was advised by a sales
20 representative that everything that was needed was supposed to be in the kit. E.J. had asked the
21 sales representative if there were other people who only ordered the Start-Up Kit and were
22 making money. The GVW sales representative told him there were a lot of people already
23 making significant amounts of money with just the kit. E.J. was also advised that he would also
24 have access to marketing coaches who would assist him in his business.

25 16. On or about May 7, 2006, E.J., of Clarksville, Indiana, paid GVW \$1,024.00 for a
26 "Platinum Package." E.J. was advised by a sales representative that he was guaranteed to receive
27 12,000 "targeted" visitors per year for life to his website. Prior to committing to the payment,
28

1 E.J. spoke to a GVW manager who dropped the price for the package from \$3,500.00 down to
2 \$1,000.00. With this package, E.J. was advised that he would receive his own domain name and
3 unlimited coaching in order to advertise his website.

4 17. On or about June 7, 2006, J.B. was paid \$2,160.00 by GVW for work related to the
5 management and development of GVW's databases and programing, which supported GVW
6 operations, product sales and services, via GVW Wells Fargo account No.XXXXXX94734, check
7 No. 13258.

8 18. On or about June 15, 2006, J.B. was paid \$2,080.00 by GVW for work related to the
9 management and development of GVW's databases and programing, which supported GVW
10 operations, product sales and services, via GVW Wells Fargo account No.XXXXXX94734, check
11 No. 13287.

12 19. On or about June 18, 2006, U.S. Postal Inspector R.K., acting in an undercover capacity,
13 called an 800 telephone number for GVW. After making the call, the undercover inspector
14 listened to and recorded an approximately 25-minute-long recorded sales pitch regarding GVW's
15 products and programs by defendant DONALD LAPRE. Among the fraudulent representations
16 were the following:

17 a. "We said, 'How can we enhance this already amazing program by fifty times – make
18 it fifty times greater and then let people go out there and make themselves a fortune?' so we
19 took our \$35.00 program, we made it fifty times more exciting, but yet we never changed
20 the price, we still only charge people \$35.00 to be completely set up with the entire
21 program."

22 b. "So if you're somebody and you're really excited about just having the opportunity to
23 spend just a couple of minutes a day and yet you get to build yourself these \$1,000.00
24 checks, you have got to try this amazing program."

25 20. On or about June 19, 2006, J.B. was paid \$2,560.00 by GVW for work related to the
26 management and development of GVW's databases and programing, which supported GVW
27
28

1 operations, product sales and services via GVW Wells Fargo account No. XXXXX94734, check
2 No. 13313.

3 21. On or about June 21, 2006, a payment in support of GVW's merchant bank services was
4 made via wire transfer, in the amount of \$16,030.94, from Torica, LLC, Wells Fargo Bank,
5 Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings, American
6 Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

7 22. On or about June 28, 2006, a payment in support of GVW's merchant bank services was
8 made via wire transfer, in the amount of \$16,111.21, from Torica, LLC, Wells Fargo Bank,
9 Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings, American
10 Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

11 23. On or about July 3, 2006, GVW ran an infomercial for its products and programs which
12 could be viewed in Midlothian, Illinois. The program was viewed by a resident of that
13 community, R.R., who then called a GVW 800 number. In the course of the call, a GVW sales
14 representative sold R.R. a package of GVW products and programs which included registration
15 as an IA for \$1,800.00.

16 24. On or about July 10, 2006, GVW sent a package containing vitamins and an invoice
17 from Phoenix, Arizona, via FedEx, to IA J.K., in Manson, Iowa.

18 25. On or about July 12, 2006, IA R.R., of Midlothian, Illinois, called GVW and spoke to
19 a GVW sales representative who then sold her a "Platinum Program" for \$600.00.

20 26. On or about July 17, 2006, J.B. was paid \$2,155.00 by GVW for work related to the
21 management and development of GVW's databases and programing, which supported GVW
22 operations, product sales and services, via GVW Wells Fargo account No. XXXXX94734, check
23 No. 13438.

24 27. On or about July 27, 2006, R.C.J., of Jackson, Mississippi, watched a 30 minute GVW
25 infomercial. R.C.J. viewed defendant DONALD LAPRE on the infomercial wherein he talked
26 about investing in a home-based business where a person could make \$5,000.00 per week.
27 Defendant DONALD LAPRE did not say the name of the business during the infomercial.

1 28. On or about July 28, 2006, R.C.J., of Jackson, Mississippi, called a GVW 800 telephone
2 number and listened to a recording. R.C.J. believes defendant DONALD LAPRE was on the
3 recording. R.C.J. was advised that she would need to get 20 new clients who bought bottles of
4 vitamins in order to get a \$1,000.00 commission. If she invested, she would become an IA for
5 GVW and would receive her own website. Her website address would be submitted to hundreds
6 of search engines. R.C.J. was sold a Co-Op program during this telephone call where other
7 persons who also bought into the program would be placed under her. R.C.J. was advised that
8 she could earn a \$500.00 commission check each time one of these persons earned \$1,000.00
9 (by selling to 20 new persons). R.C.J. allowed \$170.99 to be charged on her credit card during
10 this call for her GVW Start-Up Kit and a Co-Op program.

11 29. On or about July 31, 2006, R.C.J., of Jackson, Mississippi, was called by a GVW sales
12 representative. The sales representative offered her a VIP website with an 800 telephone
13 number. R.C.J. was advised that a unique 800 telephone number would be assigned to her
14 website and she would receive credit for any sales to persons calling it. R.C.J. allowed \$75.00
15 to be charged on her credit card for this program.

16 30. On or about July 31, 2006, B.E., of Long Beach Township, New Jersey, watched a half
17 hour GVW infomercial. B.E. called the GVW 800 telephone number listed on the infomercial
18 and spoke to a GVW sales representative. B.E. was advised that she would need to sell bottles
19 of vitamins to 20 people in order to receive a \$1,000.00 commission. B.E. paid \$35.00 by credit
20 card for a GVW Start-Up Kit.

21 31. On or about August 8, 2006, B.E., of Long Beach Township, New Jersey, allowed
22 \$1,095.00 to be charged on her debit card for "targeted" visitor traffic. B.E. understood that the
23 targeted traffic was supposed to be both persons interested in purchasing bottles of vitamins
24 and/or a GVW business opportunity program.

25 32. On or about August 9, 2006, IAs B.E., of Long Beach Township, New Jersey, and
26 R.C.J., of Jackson, Mississippi, were simultaneously credited for the same vitamin purchase by
27 D.L., of Texas.

1 33. On or about August 9, 2006, IAs B.E., of Long Beach Township, New Jersey, and R.J.,
2 of Jackson, Mississippi, were simultaneously credited for the same vitamin purchase by E.A.,
3 of Crum Lynne, Pennsylvania.

4 34. On or about September 8, 2006, a payment in support of GVW's merchant bank services
5 was made via wire transfer, in the amount of \$40,000.00, from Torica, LLC, Wells Fargo Bank,
6 Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings, American
7 Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

8 35. On or about September 13, 2006, a payment in support of GVW's merchant bank
9 services was made via wire transfer, in the amount of \$37,729.00, from Torica, LLC, Wells
10 Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings,
11 American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

12 36. On or about September 20, 2006, a payment in support of GVW's merchant bank
13 services was made via wire transfer, in the amount of \$36,913.21, from Torica, LLC, Wells
14 Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings,
15 American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

16 37. On or about September 27, 2006, a payment in support of GVW's merchant bank
17 services was made via wire transfer, in the amount of \$37,742.95, from Torica, LLC, Wells
18 Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings,
19 American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

20 38. On or about October 10, 2006, GVW sent a package containing IA gift vouchers from
21 Phoenix, Arizona, via the USPS, to IA J.L.B. in Lincolnvile, South Carolina.

22 39. On or about November 16, 2006, a sales representative of GVW made a sale to U.S.
23 Postal Inspector L.B., acting in an undercover capacity, in the amount of \$89.68. The sale
24 included GVW's initial setup fee of \$35.00 plus \$13.65 shipping costs for a "generic" website
25 and a Start-Up Kit. This kit included a defendant DONALD LAPRE CD and an "Independent
26 Advertiser Program" booklet. Included in the sale was a book entitled "Curing Illness," and a
27 website in the name of www.DontForgetToTakeYourVitamins1040.com/PARRA2920.

1 40. On or about November 17, 2006, GVW sent a letter containing "Your Website
2 Information," from Phoenix, Arizona, via the USPS, to U.S. Postal Inspection Service Postal
3 Inspector L.B. using the undercover name L.P. for his IA in Chandler, Arizona.

4 41. On or about November 18, 2006, IA R.B., of Raleigh, North Carolina, and the U.S.
5 Postal Inspection Service Undercover IA, Phoenix, Arizona, were simultaneously credited for
6 the same vitamin purchase by C.B.M., of California.

7 42. On or about November 21, 2006, defendant DONALD LAPRE was paid \$15,000, in
8 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15124,
9 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

10 43. On or about November 25, 2006, IA R.B., of Raleigh, North Carolina, and the U.S.
11 Postal Inspection Service Undercover IA, Phoenix, Arizona, were simultaneously credited for
12 the same vitamin purchase by C.H., Eau Claire, Wisconsin.

13 44. On or about November 28, 2006, defendant DONALD LAPRE was paid \$15,000, in
14 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15152,
15 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

16 45. On or about November 30, 2006, a sales representative of GVW made a sale to U.S.
17 Postal Inspector L.B., acting in an undercover capacity, in the amount of \$995.00. This purchase
18 was for the GVW 12,000 Targeted Visitor Program. The purchase was for 12,000 "targeted"
19 Internet visitors to be sent to an undercover GVW website. The sales representative advised that
20 the targeted consumers were already interested in purchasing vitamins or investing in a
21 home-based business. Additional programs that were included for "free" in order to encourage
22 the undercover inspector to spend \$995.00 during the phone call included the GVW Direct Mail,
23 Platinum, VIP and Premium 17% Registered Advertisers programs.

24 46. On or about December 1, 2006, GVW sent a "Get Started Right Now!" booklet, from
25 Phoenix, Arizona, via the USPS, to U.S. Postal Inspection Service Postal Inspector L.B. using
26 the undercover name L.P. for his IA in Chandler, Arizona.

1 47. On or about December 2, 2006, IA R.B., Raleigh, North Carolina, and the U.S. Postal
2 Inspection Service Undercover IA, Phoenix, Arizona, were simultaneously credited for the same
3 vitamin purchase by J.D., Highland, Indiana.

4 48. On or about December 7, 2006, GVW paid Cannella Response Television, \$45,318.41,
5 for advertising and infomercial services with check No. 14929 from GVW's Wells Fargo
6 account No. XXXXX94734.

7 49. On or about December 7, 2006, defendant DONALD LAPRE was paid \$15,000, in
8 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 14926,
9 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

10 50. On or about December 9, 2006, IA R.B., of Raleigh, North Carolina, and the U.S. Postal
11 Inspection Service Undercover IA, Phoenix, Arizona, were simultaneously credited for the same
12 vitamin purchase by C.L., of Michigan.

13 51. On or about December 21, 2006, GVW sent a package containing materials including
14 "Congratulations on Your New V.I.P. Status!" and "Your Website Information" from Phoenix,
15 Arizona, via the USPS, to IA B.L.B. in Toney, Alabama.

16 52. On or about January 7, 2007, GVW paid Cannella Response Television, \$55,741.42,
17 for advertising and infomercial services with check No. 15193 from GVW's Wells Fargo
18 account No. XXXXX94734.

19 53. On or about January 4, 2007, defendant DONALD LAPRE was paid \$15,000, in
20 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15182,
21 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

22 54. On or about January 7, 2007, GVW paid Maximum Coverage Media, \$53,878.02, for
23 advertising and infomercial services with check No. 15195 from GVW's Wells Fargo account
24 No. XXXXX94734.

25 55. On or about January 10, 2007, defendant DONALD LAPRE was paid \$15,000, in
26 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15201,
27 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

1 56. On or about January 10, 2007, GVW paid Cannella Response Television, \$99,374.89,
2 for advertising and infomercial services with check No. 15204 from GVW's Wells Fargo
3 account No. XXXXX94734.

4 57. On or about January 15, 2007, GVW sent a package containing a "Welcome Package"
5 and "Your Website Information" from Phoenix, Arizona, via FedEx, to IA R.S. in Arnold,
6 Missouri.

7 58. On or about January 17, 2007, GVW paid Maximum Coverage Media, \$47,720.99, for
8 advertising and infomercial services with check No. 15221 from GVW's Wells Fargo account
9 No. XXXXX94734.

10 59. On or about January 17, 2007, defendant DONALD LAPRE was paid \$15,000, in
11 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15218,
12 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

13 60. On or about January 24, 2007, GVW paid Cannella Response Television, \$40,498.08,
14 for advertising and infomercial services with check No. 15238 from GVW's Wells Fargo
15 account No. XXXXX94734.

16 61. On or about January 24, 2007, defendant DONALD LAPRE was paid \$15,000, in
17 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15234,
18 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

19 62. On or about January 30, 2007, defendant DONALD LAPRE was paid \$15,000, in
20 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15252,
21 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

22 63. On or about February 7, 2007, defendant DONALD LAPRE was paid \$15,000, in
23 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 15279,
24 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

25 64. On or about February 19, 2007, defendant DONALD LAPRE was paid \$15,000, in
26 proceeds derived from GVW's ongoing mail and wire schemes to defraud, via check No. 14433,
27 from the Greatest Vitamin in the World Wells Fargo Bank Account No. XXXXXX4734.

1 65. On or about March 1, 2007, GVW paid Cannella Response Television, \$52,268.33, for
2 advertising and infomercial services with check No. 14485 from GVW's Wells Fargo account
3 No. XXXXX94734.

4 66. On or about March 14, 2007, a payment in support of GVW's merchant bank services
5 was made via wire transfer, in the amount of \$11,390.04, from Torica, LLC, Wells Fargo Bank,
6 Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings, American
7 Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

8 67. On or about March 21, 2007, a payment in support of GVW's merchant bank services
9 was made via wire transfer, in the amount of \$12,446.89, from Torica, LLC, Wells Fargo Bank,
10 Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings, American
11 Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

12 68. On or about March 29, 2007, a payment in support of GVW's merchant bank services
13 was made via wire transfer, in the amount of \$14,440.37, from Torica, LLC, Wells Fargo Bank,
14 Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings, American
15 Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

16 69. On or about April 3, 2007, GVW sent a package containing materials including
17 "Congratulations on Your New V.I.P. Status!" and "Your Website Information" from Phoenix,
18 Arizona, via the USPS, to IA C.S. in Lincoln City, Oregon.

19 70. On or about April 4, 2007, GVW paid Cannella Response Television, \$59,204.42, for
20 advertising and infomercial services with check No. 15488 from GVW's Wells Fargo account
21 No. XXXXX94734.

22 71. On or about April 6, 2007, a payment in support of GVW's merchant bank services was
23 made via wire transfer, in the amount of \$12,329.83, from Torica, LLC, Wells Fargo Bank,
24 Account No. XXX-XXX0725, located in Phoenix, Arizona, to SSF Holdings, American
25 Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

1 72. On or about April 11, 2007, GVW paid Mercury Media, \$33,136.00, for advertising and
2 infomercial services with check No. 15494 from GVW's Wells Fargo account No.
3 XXXXX94734.

4 73. On or about April 23, 2007, GVW paid Cannella Response Television, \$63,236.88, for
5 advertising and infomercial services with check No. 15447 from GVW's Wells Fargo account
6 No. XXXXX94734.

7 74. On or about May 3, 2007, GVW sent a package containing materials including "Get
8 Started Right Now!" and "Your Website Information" from Phoenix, Arizona, via the USPS, to
9 IA D.J. in Miami Beach, Florida.

10 75. On or about August 7, 2007, GVW sent a package containing materials including "Your
11 Website Information" from Phoenix, Arizona, via the USPS, to IA H.P. in Elkview, West
12 Virginia.

13 76. On or about August 17, 2007, GVW sent a package containing vitamins and
14 promotional materials regarding vitamins and other pills sold by GVW from Phoenix, Arizona,
15 via the USPS, to IA S.S. in Prospect Heights, Illinois.

16 All in violation of Title 18, United States Code, Sections 371 and 2.

17
18 **COUNTS 2 THROUGH 11**

19 **(Mail Fraud)**

20 12. The factual allegations in paragraphs 1 through 11 of the Indictment are incorporated
21 by reference and realleged as though set forth fully herein.

22 13. Beginning at a time unknown to the Grand Jury, but at least as early as on or about April
23 2003, and continuing through at least on or about October, 2007, in the District of Arizona and
24 elsewhere, defendant DONALD LAPRE, and others known and unknown to the Grand Jury,
25 doing business under the entities described above, did knowingly and willfully devise and intend
26 to devise a scheme and artifice to defraud and to obtain money and property by means of
27
28

1 materially false and fraudulent promises, pretenses and representations, and means of
2 telemarketing.

3 14. On or about the dates listed below, in the District of Arizona and elsewhere, for the
4 purpose of executing and attempting to execute said scheme and artifice to defraud and to obtain
5 money and property by means of materially false and fraudulent promises, pretenses and
6 representations, and means of telemarketing, defendant DONALD LAPRE, and others known
7 and unknown to the Grand Jury, doing business under the entities described above, placed and
8 caused to be placed in a post office and authorized depository for mail matter, to be sent and
9 delivered by the United States Postal Service, and deposited and caused to be deposited for
10 delivery by commercial interstate carriers, as shown below for each Count, for the purpose of
11 executing the scheme to defraud for the items identified in each Count, from Phoenix, Arizona,
12 to the locations set forth in the chart below, each such instance being a separate Count of this
13 Indictment:

Count	Date of Mailing (On or About)	Mail Matter	Delivery Location	Means of Shipment
2	07/10/2006	Package from GVW Containing Vitamins and an Invoice	J.K. Manson, Iowa	FedEx
3	10/10/2006	GVW IA Gift Vouchers	J.L.B. Lincolnville, South Carolina	USPS
4	11/17/2006	GVW "Your Website Information" Letter	U.S. Postal Inspection Service Postal Inspector L.B. using the undercover name L.P. in Chandler, Arizona	USPS
5	12/01/2006	GVW "Get Started Right Now!" Booklet	U.S. Postal Inspection Service Postal Inspector L.B. using the undercover name L.P. in Chandler, Arizona	USPS

Count	Date of Mailing (On or About)	Mail Matter	Delivery Location	Means of Shipment
6	12/21/2006	GVW Materials Including "Congratulations on Your New V.I.P. Status!" and "Your Website Information" Letter	B.L.B. Toney, Alabama	USPS
7	01/15/2007	GVW Welcome Package and "Your Website Information" Letter	R.S. Arnold, Missouri	FedEx
8	04/03/2007	GVW Materials Including "Congratulations on Your New V.I.P. Status!" and "Your Website Information" Letter	C.S. Lincoln City, Oregon	USPS
9	05/03/2007	GVW Materials Including "Get Started Right Now!" and "Your Website Information" Letter	D.J. Miami Beach, Florida	USPS
10	08/07/2007	GVW Materials Including "Your Website Information" Letter	H.P. Elkview, West Virginia	USPS
11	08/17/2007	GVW Vitamins and Promotional Materials Regarding Vitamins and Other Pills Sold by GVW	S.S. Prospect Heights, Illinois	USPS

All in violation of Title 18, United States Code, Sections 1341, 2326, and 2.

COUNTS 12 THROUGH 21**(Wire Fraud)**

15. The factual allegations in paragraphs 1 through 14 of the Indictment are incorporated by reference and realleged as though set forth fully herein.

16. Beginning at a time unknown to the Grand Jury, but at least as early as on or about April 2003, and continuing through at least on or about October, 2007, in the District of Arizona and elsewhere, defendant DONALD LAPRE, and others known and unknown to the Grand Jury, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent promises, pretenses and representations, and means of telemarketing.

17. On or about the dates listed below, in the District of Arizona and elsewhere, for the purpose of executing and attempting to execute the subject scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent promises, pretenses and representations, and means of telemarketing, defendant DONALD LAPRE, and others known and unknown to the Grand Jury, doing business under the entities described above, transmitted or caused to be transmitted by means of wire communication in interstate and foreign commerce, the following writings, signs, signals, pictures, or sounds, as shown below for each Count, in the District of Arizona and elsewhere, each such instance being a separate Count of this Indictment:

Count	Date (On or About)	Description of Transmission by Wire
12	06/21/2006	Payment of \$16,030.94 from Torica, LLC, Wells Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, via wire transfer, to SSF Holdings, American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.
13	06/28/2006	Payment of \$16,111.21 from Torica, LLC, Wells Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, via wire transfer, to SSF Holdings, American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.

Count	Date (On or About)	Description of Transmission by Wire
14	09/08/2006	Payment of \$40,000.00 from Torica, LLC, Wells Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, via wire transfer, to SSF Holdings, American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.
15	09/13/2006	Payment of \$37,729.00 from Torica, LLC, Wells Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, via wire transfer, to SSF Holdings, American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.
16	09/20/2006	Payment of \$36,913.21 from Torica, LLC, Wells Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, via wire transfer, to SSF Holdings, American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.
17	09/27/2006	Payment of \$37,742.95 from Torica, LLC, Wells Fargo Bank, Account No. XXX-XXX0725, located in Phoenix, Arizona, via wire transfer, to SSF Holdings, American Business, Bank, Account No. XXXX1114, located in Los Angeles, California.
18	03/14/2007	Payment of \$11,390.04 from The Greatest Vitamin in the World, Wells Fargo Bank, Account No. XXX-XXX4734, located in Phoenix, Arizona, via wire transfer, to SSF Holdings American Business, Bank Account No. XXXX1114, located in Los Angeles, California.
19	03/21/2007	Payment of \$12,446.89 from The Greatest Vitamin in the World, Wells Fargo Bank, Account No. XXX-XXX4734, located in Phoenix, Arizona, via wire transfer, to SSF Holdings American Business, Bank Account No. XXXX1114, located in Los Angeles, California.
20	03/29/2007	Payment of \$14,440.37 from The Greatest Vitamin in the World, Wells Fargo Bank, Account No. XXX-XXX4734, located in Phoenix, Arizona, via wire transfer, to SSF Holdings American Business, Bank Account No. XXXX1114, located in Los Angeles, California.
21	04/06/2007	Payment of \$12,329.83 from The Greatest Vitamin in the World, Wells Fargo Bank, Account No. XXX-XXX4734, located in Phoenix, Arizona, via wire transfer, to SSF Holdings American Business, Bank Account No. XXXX1114, located in Los Angeles, California.

All in violation of Title 18, United States Code, Sections 1343, 2326, and 2.

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COUNTS 22 THROUGH 31**(Promotional Money Laundering)**

18. The factual allegations in paragraphs 1 through 17 of the Indictment are incorporated by reference and realleged as though set forth fully herein.

19. On or about the dates set forth below, each such instance being a separate Count of this Indictment, defendant DONALD LAPRE, and others known and unknown to the Grand Jury, doing business under the entities described above, within the United States, knowingly engaged in the following monetary transactions in the District of Arizona, and elsewhere, as set forth below, in order to promote and carry on the scheme to defraud, and which was derived from specified unlawful activity, namely violations of the Mail Fraud statute, Title 18, United States Code, Section 1341, as alleged in Counts 2 through 11 of the Indictment, and violations of the Wire Fraud statute, Title 18, United States Code, Section 1343, as alleged in Counts 12 through 21 of the Indictment:

Count	Check No.	Date of Financial Transaction (Financial Institution)	Check Amount (Payee)	Account Name (Account No.)	Type of Expense Paid
22	14929	12/07/2006 (Wells Fargo Bank)	\$45,318.41 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
23	15193	01/07/2007 (Wells Fargo Bank)	\$55,741.42 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
24	15195	01/07/2007 (Wells Fargo Bank)	\$53,878.02 Maximum Coverage Media	Greatest Vitamin in the World (# XXXXXX4734)	Advertising/ Infomercial
25	15204	01/10/2007 (Wells Fargo Bank)	\$99,374.89 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial

Count	Check No.	Date of Financial Transaction (Financial Institution)	Check Amount (Payee)	Account Name (Account No.)	Type of Expense Paid
22	14929	12/07/2006 (Wells Fargo Bank)	\$45,318.41 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
23	15193	01/07/2007 (Wells Fargo Bank)	\$55,741.42 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
24	15195	01/07/2007 (Wells Fargo Bank)	\$53,878.02 Maximum Coverage Media	Greatest Vitamin in the World (# XXXXXXX4734)	Advertising/ Infomercial
26	15221	01/17/2007 (Wells Fargo Bank)	\$47,720.99 Maximum Coverage Media	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
27	15238	01/24/2007 (Wells Fargo Bank)	\$40,498.08 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
28	14485	03/01/2007 (Wells Fargo Bank)	\$52,268.33 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
29	15488	04/04/2007 (Wells Fargo Bank)	\$59,204.42 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
30	15494	04/11/2007 (Wells Fargo Bank)	\$33,136.00 Mercury Media	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial
31	15447	04/23/2007 (Wells Fargo Bank)	\$63,236.88 Cannella Response Television	Greatest Vitamin in the World (XXXXXXX4734)	Advertising/ Infomercial

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(I) and 2.

COUNTS 32 THROUGH 41**(Transactional Money Laundering)**

20. The factual allegations in paragraphs 1 through 19 of the Indictment are incorporated by reference and realleged as though set forth fully herein.

21. On or about the dates set forth below, each such instance being a separate Count of this Indictment, defendant DONALD LAPRE, and others known and unknown to the Grand Jury, doing business under the entities described above, within the United States, knowingly engaged in monetary transactions from a financial institution in the District of Arizona, as set forth below, in criminally derived property of a value greater than \$10,000.00, and which was derived from specified unlawful activity, namely violations of the Mail Fraud statute, Title 18, United States Code, Section 1341, as alleged in Counts 2 through 11 of the Indictment, and violations of the Wire Fraud statute, Title 18, United States Code, Section 1343, as alleged in Counts 12 through 21 of the Indictment:

Count	Date of Financial Transaction (Financial Institution)	Check Amount (Payee) [Check No.]	Account Name (Account No.)	Type of Expense Paid
32	11/21/2006 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15124]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
33	11/28/2006 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15152]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
34	12/07/2006 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [14926]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
35	01/04/2007 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15182]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
36	01/10/2007 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15201]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre

Count	Date of Financial Transaction (Financial Institution)	Check Amount (Payee) [Check No.]	Account Name (Account No.)	Type of Expense Paid
37	01/17/2007 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15218]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
38	01/24/2007 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15234]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
39	01/30/2007 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15252]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
40	02/07/2007 (Wells Fargo Bank)	\$15,000 (Donald Lapre) [15279]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre
41	02/19/2007 (Wells Fargo Bank)	\$17,000 (Donald Lapre) [14433]	Greatest Vitamin in the World (XXXXXXX4734)	To Donald Lapre

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE ALLEGATIONS

22. The factual allegations in paragraphs 1 through 21 of the Indictment are incorporated by reference and realleged as though set forth fully herein.

23. Pursuant to 18 U.S.C. § 982(a)(8), as a result of committing one or more of the Mail Fraud (18 U.S.C. § 1341) offenses, in Counts 2 through 11, and Wire Fraud (18 U.S.C. § 1343) offenses, in Counts 12 through 21, upon conviction, the Court shall order that defendant so convicted to forfeit to the United States, any real or personal property:

a. used or intended to be used to commit, facilitate, or promote the commission of such offenses; and

b. constituting, derived from, or traceable to the gross proceeds obtained directly or indirectly as a result of the offenses.

24. Pursuant to 18 U.S.C. § 982, as a result of committing one or more of the Promotional Money Laundering (18 U.S.C. § 1956(a)(1)(A)(I)) offenses, in Counts 22 through 31, and the Transactional Money Laundering (18 U.S.C. § 1957) offenses, in Counts 32 through 41, the Court shall order that defendant, so convicted, forfeit to the United States, any property, real or personal, involved in such offense, or any property traceable to such property.

25. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), defendant shall forfeit substitute property, up to the value of the amount described above, if by any act or omission of defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All in accordance with Title 18, United States Code, Sections 982(a)(1)(8) and (b), 1341, and 1343; and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/S/ _____
FOREPERSON OF THE GRAND JURY
Date: June 8, 2011

DENNIS K. BURKE
United States Attorney
District of Arizona

/S/
FREDERICK A. BATTISTA
Assistant U.S. Attorney